



Kathleen Sebelius, Governor
Roderick L. Bremby, Secretary

DEPARTMENT OF HEALTH
AND ENVIRONMENT

www.kdheks.gov

August 11, 2005

Mr. Dave Burns
Central States Thermo King
400 Shawnee Avenue
Kansas City, Kansas 66105

Dear Mr. Burns,

On March 5, 2008, I conducted a routine hazardous waste inspection at Central States Thermo King location at 400 Shawnee Avenue in Kansas City, Kansas, EPA ID# KSD 031 285 984. The inspection was authorized by KAR 28-31-12. During this inspection, no violations were observed. I did direct the facility to re-label a tank and drum marked "waste oil" with the words "Used Oil" per KAR 28-21-16.

From my discussions with John Russell, it is my understanding that the only regulated wastes currently generated by Central States Thermo King at this location are used oil, recycled refrigerants, cloth rags and solvent from a solvent sink which is managed under a continued use program (CUP). Mr. Russell stated that no other hazardous or regulated wastes are being generated at the Shawnee Avenue location. Based on these statements and observations made during my walk-through of the facility, it is my assessment that this facility is a small quantity generator of hazardous wastes, not a Kansas Generator of hazardous wastes, as previously reported. Enclosed is a copy of the Hazardous Waste Generator's Handbook. To confirm your facility's status as a small quantity generator, I encourage you to complete the notification form in the handbook, and submit it to the Bureau of Waste Management. 3/24/08
wp

Please be aware that if, in the future, Central States Thermo King generates 55 pounds or more of hazardous waste in any calendar month at its Shawnee Avenue location, the company is required to update its notification to reflect the additional types or volumes of hazardous wastes generated. Your cooperation with the waste management program is appreciated. If you have questions concerning this letter, please call, (785) 842-4600.

493748



RCRA

Sincerely,

Laura D. Routh, CHMM
Waste Management Program, NE District Office
Bureau of Environmental Field Services

cc: Jim Rudeen, BWM
Rebecca Wenner, BWM
NEDO file

NORTHEAST DISTRICT OFFICE, 800 W. 24TH ST., LAWRENCE, KS 66046
Phone 785-842-4600 Fax 785-842-3537



KANSAS DEPARTMENT OF HEALTH AND ENVIRONMENT

BUREAU OF WASTE MANAGEMENT
BUREAU OF ENVIRONMENTAL FIELD SERVICES



COMPLIANCE INSPECTION CHECKLIST HAZARDOUS WASTE COVER PAGE

General

☒ Routine

☐ Complaint

EPA/ ID/Permit No. KSD 031 285 984 Time 1 PM Date 3/5/08

Facility Name Central States Thermo King District NE

Street 400 Shawnee Avenue City Kansas City ,KS ZIP 66105

Mailing Address (if different than above) _____

County Wyandotte Number of Employees 23

Phone 913 - 371 - 0868 Fax 913 - 371 - 4929 e-mail 4burns@cstk.com

Contact(s) John Russel/Dave Burns Inspector(s) Laura Routh

Type of Business refridgerator truck repair and unit installation

Operating Hours and Days M-F, 7 AM - 6 PM

Lat/Long Location Method: _____ Lat/Long Location Feature: _____

Latitude: (e.g. 37.57621) _____ Longitude: (e.g. -101.57621) _____

Has the Lat/Long been entered in the SW database? Yes ☐ No ☒

Hazardous Waste Inspection:

☒ Yes

☐ No

Generator Classification:

☐ Closed/Inactive

☒ Small Qty. Generator

☐ EPA Generator

☐ Not a Generator

☐ Kansas Generator

☐ Transporter

Other Regulated Activities:

☐ T/S/D Facility

☐ Tank System

☐ Subpart BB

(complete applicable checklist) ☐ Universal Waste Activities

Has the company declared any information/processes as trade secrets KSA 65-3447? no

If yes, explain: _____

If facility is closed/inactive, or has recently moved please provide a brief description. _____

Used Oil Activities: ☒ Yes ☐ No

Does the facility have a total above-ground storage capacity of used oil (excluding containers less than 55-gallons) of more than 1,320 gallons? ☐ Yes ☒ No

If yes, then the facility is subject to SPCC requirements due to used oil activities.

Facility Used Oil Activities (Attach a checklist for each one marked):

☒ Generator

☐ Collection Center / Aggregation Point

☐ Transporter / Transfer Facility

☐ Used Oil Processor / Re-Refiner

☐ Used Oil Burner (Off-Spec Fuel)

☐ Used Oil Marketer

Attach all applicable checklists.

**SUBPART C
USED OIL GENERATOR
COMPLIANCE INSPECTION CHECKLIST**

	Off-Spec Used Oil	On-Spec Used Oil	Oil Filters
Types of Oils: (i.e. motor oil, cooling oil, cutting oil, compressor oil)	engine oil and compressor oil		
Amount generated per month:	50 gallon/mo		
Amount received from off-site sources:	none		
Amount presently in storage:	200 gallons		
Accumulation time:	3 months		
Present recycling methods:	RS Used Oil		
Name of UO Transporter	RS Used Oil		

YES NO NA V#

1. If the generator mixes hazardous waste with used oil without managing the mixture as hazardous waste, does the facility fall under the SQG exemption?
K.A.R. 28-31-4(p) [462]

☐ YES ☐ NO ☒ NA ☐ V#

2. If the generator stores used oil on-site:
 - a. Is the storage unit(s) in good condition? **KAR 28-31-16/40 CFR 279.22(b) [464]**

☒ YES ☐ NO ☐ NA
 - b. Is the storage unit(s) free from leaks? **KAR 28-31-16/40 CFR 279.22(b) [465]**

☒ YES ☐ NO ☐ NA
 - c. Is the storage unit(s) and/or fill pipe(s) clearly labeled with the words "USED OIL"? **KAR 28-31-16/40 CFR 279.22(c) [466]** (If storage unit(s) is labeled "Waste Oil", simply make a comment that they should be re-labeled "Used Oil.")

☐ YES ☒ NO ☐ NA

3. If there has been a release of used oil:
 - a. Was the leak stopped? **KAR 28-31-16/40 CFR 279.22(d)(1) [468]**

☐ YES ☐ NO ☒ NA
 - b. Was the release contained? **KAR 28-31-16/40 CFR 279.22(d)(2) [469]**

☐ YES ☐ NO ☒ NA
 - c. Was the release cleaned-up and managed properly?
KAR 28-31-16/40 CFR 279.22(d)(3) [470]

☐ YES ☐ NO ☒ NA
 - d. If necessary, was the storage unit repaired or replaced?
KAR 28-31-16/40 CFR 279.22(d)(4) [471]

☐ YES ☐ NO ☒ NA

SUBPART C (Continued)

YES NO NA V#

4. If the generator burns used oil on-site in a space heater,
- a. Does generator burn only used oil that the generator/operator generates or used oil received from household do-it-yourself used oil generators, or used oil from any source that has been determined to be on-spec? **KAR 28-31-16/40 CFR 279.23(a) [473]** ☐ ☐ ☒
- b. Is the space heater designed to have a maximum capacity of not more than 0.5 million Btu per hour? **KAR 28-31-16/40 CFR 279.23(b) [474]** ☐ ☐ ☒
- c. Are the combustion gases from the space heater vented to the ambient air? **KAR 28-31-16/40 CFR 279.23(c) [475]** ☐ ☐ ☒
5. If the generator self-transportes used oil to an approved collection site or to an aggregation point owned by the generator,
- a. Does the generator transport used oil in a vehicle owned by the generator or an employee of the generator? **KAR 28-31-16/40 CFR 279.24(a)(1) or 40 CFR 279.24(b)(1) [477]** ☐ ☐ ☒
- b. Does the generator transport no more than 55 gallons of used oil at any time? **KAR 28-31-16/40 CFR 279.24(a)(2) or 40 CFR 279.24(b)(2) [478]** ☐ ☐ ☒

NOTE: IF NO TO QUESTION 5-a OR 5-b, COMPLETE USED OIL TRANSPORTER CHECKLIST.

6. If the generator has their used oil reclaimed under a tolling (contractual) agreement,
- a. Does the tolling (contractual) agreement indicate the type of used oil and the frequency of shipments? **KAR 28-31-16/40 CFR 279.24(c)(1) [480]** ☐ ☐ ☒
- b. Is the vehicle used to transport the used oil to the processing/re-refining facility and to deliver recycled used oil back to the generator owned and operated by the used oil processor/re-refiner? **KAR 28-31-16/40 CFR 279.24(c)(2) [481]** ☐ ☐ ☒
- c. Is reclaimed oil returned to the generator? **KAR 28-31-16/40 CFR 279.24(c)(3) [482]** ☐ ☐ ☒
7. Does the generator use a used oil transporter who is registered with KDHE? **K.A.R. 28-31-6(b)** ☒ ☐ ☐
- Name of Transporter: RS Used Oil

Used Oil Generator Requirements:

☒ **Compliance**

☐ **Non-Compliance**

☐ **NA**

V# = Violation Number

Used Oil Generator Checklist Revised May 26, 2006

**BUREAU OF ENVIRONMENTAL FIELD SERVICES
NORTHEAST DISTRICT OFFICE
MEMORANDUM**

TO: Bureau of Waste Management, KDHE

FROM: Laura Routh, NEDO

Laura Routh

DATE: March 6, 2008

SUBJECT: Inspection of Central States Thermo King, EPA ID #KSD 031 285 984

On March 5, 2008, I conducted a routine hazardous waste inspection at Central States Thermo King in Kansas City, KS. The company provides service, repair and installation of refrigeration trucks. In May of 2007, the company notified as a Kansas Generator.

Based on statements made by John Russell, Manager, and my observations during the walk-through of the building and grounds, this company is a small quantity generator of hazardous wastes at its Shawnee Avenue location in Kansas City, Kansas. The company generates used oil, refrigerants (which are recycled) solvent (the solvent is managed in a solvent sink under a Safety Kleen continued use program) and cloth rags, which are laundered. Small amounts of solvent are used on rags. Mr. Russell said that no other hazardous wastes are generated or managed at this location. No hazardous wastes were observed in storage on the day of the inspection. Outside the facility's building, I observed a 300-gallon tank, partially full, containing used oil. The tank was marked "waste oil" as was a 55 gallon drum observed in the same area. I directed the company to re-mark the containers according to KAR 28-21-16. Mr. Russell stated that all records related to waste generation are maintained by the company's corporate office.

On March 6, 2008, I sent a letter to the facility's contact (listed on their notification) John Burns. I provided Mr. Burns with a copy of the hazardous waste generator's handbook, and encouraged him to complete an updated notification form and submit it to the BWM to reflect the company's status as a small quantity generator.